



## INFORMATIONAL MEMO

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**TITLE: TRANSITION SERVICES POST RULE UPDATE**

**SUPERSEDES NUMBER: N/A**

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**DIVISION AND OFFICE: OFFICE OF COMMUNITY LIVING**

**PROGRAM AREA: PROGRAM DEVELOPMENT AND EVALUATION**

**APPROVED BY: ROBERT BOHANAN**

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*HCPF Memo Series can be accessed online: <https://www.colorado.gov/hcpf/memo-series>*

### **Purpose and Audience:**

The purpose of this Informational Memo is to provide an update to stakeholders on the sustainability of the Colorado Choice Transitions (CCT) demonstration program. This memo provides updates regarding the finalized regulations for Transition Coordination and Transition Services and provides direction for future training.

### **Information:**

House Bill (HB) 18-1326 was signed into law in April 2018, directing the Department of Health Care Policy & Financing (the Department) to seek the necessary state plan and waiver amendments to create sustainability for the Colorado Choice Transitions (CCT) demonstration program. From April 2018 to February 2019, the Department held stakeholder engagement meetings to ask for feedback on implementation of demonstration services to the ongoing Medicaid program, which are called Transition Coordination and Transition Services.

Initial rules were presented at the Medical Services Board (MSB) on October 12, 2018 and were postponed due to stakeholder feedback. The Department researched additional options to address stakeholder concerns and hosted two additional stakeholder meetings in November and December 2018 to present the research and alternative options for stakeholders to review and provide feedback.

As a result of these collaborative efforts, the Department presented emergency rules on December 14, 2018, to be effective January 1, 2019. The rules were unanimously

passed by the MSB. The Department held three additional meetings to discuss the Life Skills Training service to solidify the service design and the appropriate oversight. On March 8, 2019, the MSB unanimously approved the final changes. The rules were published on April 30, 2019. Stakeholders can access the published rules at the links provided below.

- Transition Services – added four services to the adult home and community-based services (HCBS) waivers (see chart below for more detail).
  - Revision to the Medical Assistance Rule concerning Life Skills Training, Home Delivered Meals, Peer Mentorship, and Transition Setup, [Section 8.553](#)
- Transition Coordination – a targeted case management benefit available to those transitioning from an institutional setting to a community-based setting.<sup>1</sup>
  - Revision to the Medical Assistance rule concerning Targeted Case Management -Transition Services, [Sections 8.519](#) and [Section 8.760](#)

### **Final Rule Changes for Transition Coordination**

In the final rule adoption, there were two major updates to Transition Coordination.

- Since emergency adoption in December, the Department worked with stakeholders to add timelines for when certain things need to be done during the transition process, such as the number of business days transition coordination agencies must respond to a transition coordination referral.
- Based on comments received during the public review, the Department included a requirement that a complaint procedure be in place for all Transition Coordination Agencies.

### **Final Rule Changes for Transition Services in HCBS Waivers**

In the final rule adoption, there were changes made in two services being sustained in the ongoing Medicaid program through HCBS waivers.

#### **1. Life Skills Training**

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<sup>1</sup> Transition Coordination excludes children under the age of 18 and persons ages 22 to 64 residing in Institutions for Mental Disease (IMD).

- The Department held a series of stakeholder meetings in January and February to solidify the service design for Life Skills Training and the appropriate oversight.
- The Department maintained lived experience as an accepted qualification for providers.
- The Department created a hybrid model for oversight of this service where providers who want to provide hands-on Training on Personal Care must obtain a Class A or B license. Providers who do not offer this component will simply need to be a certified provider.

**2. Home Delivered Meals**

- The Department addressed stakeholder concerns with flexibility in the Home Delivered Meals service. The final rule added an option to ship the meals.
- If the meal is shipped, the provider must confirm meal delivery to ensure the client receives the meal in a timely fashion, and to determine whether the client is satisfied with the quality of the meal.

The following chart outlines which Transition Services are available under which HCBS waivers.

<b>NAME OF WAIVER</b>	<b>Brain Injury Waiver (BI)</b>	<b>Community Mental Health Supports Waiver (CMHS)</b>	<b>Developmental Disabilities Waiver (DD)</b>	<b>Elderly, Blind and Disabled Waiver (EBD)</b>	<b>Spinal Cord Injury Waiver (SCI)</b>	<b>Supported Living Services Waiver (SLS)</b>
Service Added	<ul style="list-style-type: none"> <li>• Home Delivered Meals</li> <li>• Peer Mentorship</li> <li>• Transition Set Up</li> </ul> <p>*Independent Life Skills Training is an existing service in the BI waiver.</p>	<ul style="list-style-type: none"> <li>• Life Skills Training</li> <li>• Home Delivered Meals</li> <li>• Peer Mentorship</li> <li>• Transition Set Up</li> </ul>	<ul style="list-style-type: none"> <li>• Home Delivered Meals</li> <li>• Peer Mentorship</li> </ul>	<ul style="list-style-type: none"> <li>• Life Skills Training</li> <li>• Home Delivered Meals</li> <li>• Peer Mentorship</li> <li>• Transition Set Up</li> </ul>	<ul style="list-style-type: none"> <li>• Life Skills Training</li> <li>• Home Delivered Meals</li> <li>• Peer Mentorship</li> <li>• Transition Set Up</li> </ul>	<ul style="list-style-type: none"> <li>• Life Skills Training</li> <li>• Home Delivered Meals</li> <li>• Peer Mentorship</li> <li>• Transition Set Up</li> </ul>

**Additional Policy and Operational Guidance**

The Department has issued Policy and Operational Memos to provide stakeholders additional guidance on the rules published on April 30, 2019. Over the next two

months, the Department will be issuing additional guidance through the Memo Series. Below is the memo which has been published as of April 30, 2019.

[PM 19-002](#) Colorado Home and Community Based Services, Transition Services

**Next Steps: In-Person Transition Coordination Trainings**

The Department will be hosting a state tour with training and opportunities for stakeholders involved in the Transition Coordination process to build relationships and connections to improve the process. The following stakeholders are encouraged to participate: Transition Coordinators, Options Counselors, Nursing Home Social Work Staff, and Case Managers. Please monitor [this website](#) for further information on dates and locations.

**Attachment(s):**

None

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